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Anne Kronenberg
Executive Director

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Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
425 12th Street, SW
Washington, DC 20554

[Submitted via FCC Electronic Comments Filing System]

Re: PS Docket 15-91 Improving Wireless Emergency Alerts and Community-Initiated Alerting

Dear Secretary Dortch:

The City and County of San Francisco (the City) appreciates the Federal Communications Commission (Commission) recent actions to improve the Wireless Emergency Alerts (WEA) system including an increased character limit and adoption of WEA messages to be sent in Spanish. The City echoes the New York Office of Emergency Management Notice of Ex Parte filed October 24, 2016.

Additionally, the City provides comments on the following sections of the Final and Proposed Rules:

- **§ 10.280 Subscribers' right to opt out of WEA notifications**
The City recommends further review of the option to opt-out of WEA notifications. While recognizing the desire of an individual to customize the type of notifications one receives, the City recommends Imminent Threat alerts be exempt from the opt-out option. The addition of the classification *Public Safety Message* should lend itself to the support of restricting subscribers from opting out of Imminent Threat alerts. Local public safety agencies should continue to restrict Imminent Threat alerts to those instances of true life safety. The City recommends Public Safety Messages and Amber Alerts continue to have an opt-out option.
- **§ 10.320 Provider alert gateway requirements (c)(3) Prioritization & § 10.410 Prioritization**
The City encourages the expedited processing of earthquake-related Imminent Threat Alerts as any delay limits the effectiveness of such an alert. Moreover, these rules underscore the Commission's forethought on future planning for a potential successful earthquake early warning system.
- **§ 10.450 Geographic targeting**
The revised section helps to clarify the need to match the specified geocode, circle, or polygon, but the City strongly believes the Commission should adopt in tandem the commercially available technologies utilized by countless applications in everyday use such as Uber and Lyft. More targeted, location based alerting will increase adoption by public safety entities and prevent

warning fatigue by eliminating over alerting. Continued development by Commercial Mobile Service (CMS) Providers will only improve targeting capabilities.

- **§ 10.441 Embedded references**

The City fully endorses the inclusion of embedded Uniform Resource Locators (URL). The ability to include URLs in a WEA message expands the ability for emergency management agencies to foster an informed public and direct people to official sources for more detailed information. Again, continued development by CMS Providers only will improve alert and warning for future imminent threats.

- **§ 10.480 Language support**

The City appreciates the inclusion of Spanish language capabilities by the Commission; however, more than 112 different languages are spoken in the San Francisco Bay Area and 45 percent of all San Francisco residents do not speak English at home. By City ordinance, all messages must be translated from English into at least three languages including Chinese, Spanish, and Tagalog. It is important the Commission continues to expand the rules to include additional languages supported by WEA.

- The City also strongly recommends the Commission to review and adopt a rule to include the features of “Many-to-One” notifications. The ability to use crowdsourced feedback during an emergency can help expedite and improve response.

The City appreciates the continued efforts of the Commission to improve WEA and support of public safety Nationwide. As always, the City will continue to work with the Commission on future issues.

Thank you for your time and consideration.

Sincerely,



Anne Kronenberg

Executive Director, San Francisco Department of Emergency Management
City and County of San Francisco